



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7**

11201 Renner Boulevard
Lenexa, Kansas 66219

25 FEB 2015

Mr. Juan Somoano
Glenn Springs Holdings, Incorporated
5005 LBJ Freeway
Dallas, Texas 75244

RE: Comprehensive RCRA Facility Investigation Summary Report
Occidental Chemical Corporation, 6200 S. Ridge Road, Wichita, Kansas
RCRA ID #KSD007482029.

Dear Mr. Somoano:

The U.S. Environmental Protection Agency has reviewed the above referenced document for the Occidental Chemical Corporation Wichita facility, dated December 18, 2014. Comments are provided below.

1. Section 3.6.2 mentions the Phase II On-Site Groundwater RFI Supplemental Report in the last paragraph, but only briefly states that it was in response to the EPA comments and was intended to provide additional information. Please elaborate on the usefulness of the data presented and the conclusions contained in that report; in particular the table discussing the suspected sources of contamination, versus those SWMUs & AOCs not suspected of being sources. This should help clarify the difference between Table 8 of the Phase II On-site Groundwater RFI Summary Report and Tables 1 & 2 of the Comprehensive RFI Summary Report.
2. Section 6.0 mentions Figure 8 in the third paragraph, but the description provided does not coincide with Figure 8 in the report; therefore please correct the reference and/or replace the table as we discussed over the phone on February 20, 2015.
3. In the fifth and sixth paragraphs of Section 6.0, where it discusses evaluations of each SWMU and AOC and introduces Tables 1 & 2, please discuss the evolution of data interpretation presented from Table 8 of the Phase II On-Site Groundwater RFI Summary Report and the revised corresponding table in Phase II On-Site Groundwater RFI Supplemental Report. Also, explain the change in focus for future management of corrective action activities from the more numerous and specific areas defined previously to the three more general categories of subdivision in Tables 1 and 2.

Please provide a response to the comments above in the form of revised red-line strike-out pages accompanied by a letter of explanation within 30 days receipt of this letter.

RCRA



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If you have questions about this letter you may reach me by phone at (913) 551-7279 or email me at roberts.bradley@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Brad Roberts", with a long horizontal flourish extending to the right.

Brad Roberts
Environmental Scientist
Waste Remediation and Permitting Branch
Air and Waste Management Division

cc: Lisa Thurman, Occidental Chemicals
Everett Spellman, KDHE-BWM
Bruce Clegg, CRA World